

COVER LETTER

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2025 SEP 19 P 2: 26

CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

Paramount Home Collections Pvt. Ltd.

36 Tavela Street, Akhtar Building
Moradabad, Uttar Pradesh 244001, India

Email: ijlal@paramounthomecollections.com

Phone: +91-9897031000

Date: Friday September 19, 2025

Attention: Clerk of the Court

United States Bankruptcy Court
District of Delaware
824 N. Market Street, 3rd Floor
Wilmington, DE 19801

Re: In re Joann Inc., et al., Case No. 25-10068 (CTG)
Claim No. 11992 – Paramount Home Collections Pvt. Ltd.

Filing: Status Update and Reservation of Rights with Declaration and Representative Exhibits

Dear Clerk of the Court,

Enclosed for filing in the above-captioned case please find the following on behalf of Paramount Home Collections Pvt. Ltd. (pro se creditor):

- Status Update and Reservation of Rights Regarding Claim No. 11992
- Declaration of Ijlal Shamsi in Support of Status Update
- Certificate of Service
- Representative Exhibits A–D

Please file the enclosed documents on the docket of Case No. 25-10068 (CTG). Kindly return a file-stamped copy to me via DLS Copy Service for my records.

Thank you for your assistance.

Respectfully submitted,

Electronically Signed By:

Mohd Ijlal Shamsi (Friday September 19, 2025)

Director
Paramount Home Collections Pvt. Ltd.

STATUS UPDATE AND RESERVATION OF RIGHTS

FILED
2025 SEP 19 P 2:26

Claim No. 11992 – Paramount Home Collections Pvt. Ltd.
(Filed Pro Se Creditor)

CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

Attention:

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:

Joann Inc., et al., Debtors.
Case No. 25-10068 (CTG)
Chapter 11

1. Background:

Paramount Home Collections Pvt. Ltd. (“Paramount”), an international trade creditor based in India, filed Proof of Claim No. 11992 in the amount of \$478,641.62, including \$135,479.21 asserted under 11 U.S.C. §503(b)(9) as an administrative priority portion and \$343,162.41 as a general unsecured claim.

The Debtors’ Eleventh Omnibus Objection [Docket No. 1319] seeks to reclassify Claim No. 11992 entirely as a general unsecured claim. Paramount filed a timely Pro Se Objection on July 28, 2025.

2. Diligence and Evidence Collection:

Since July 2025, Paramount has diligently pursued Proofs of Delivery (PODs) and warehouse receiving records from multiple carriers and logistics providers (including TLDV, Hapag-Lloyd, Delmar, and Century). Despite repeated reminders, several providers have not responded or have refused to cooperate.

Certain PODs were received but not all. The counsel of the Plan Administrator is well aware of all the facts and circumstances as they have always been copied on every single email and correspondence.

After all attempts, Paramount also requested that the Plan Administrator, through her counsel Cole Schotz (“Plan Counsel”), provide the underlying receipt records that were referenced in

internal spreadsheets. That request was denied by Plan Counsel between September 5 ~ September 12, 2025, email thread [Exhibit C].

For brevity and to respect the Court's time, Paramount attaches only *representative exhibits* demonstrating its diligence from September 2025. Numerous additional reminder emails and follow-ups are available and can be produced upon request since June/July 2025. [Exhibit B]

3. Current Position:

Paramount notes that the Plan Administrator has already acknowledged the validity of Claim No. 11992 by classifying it as a general unsecured claim in the amount of \$478,641.62. The dispute relates only to whether a portion of that claim qualifies as an administrative priority under §503(b)(9). Paramount respectfully maintains that it does, and that the Court should reserve determination of this issue until all relevant receiving records are produced.

Paramount also observes that certain carriers and logistics providers, who previously indicated their involvement, have since failed to cooperate in providing PODs. Paramount does not assert definitive proof at this time; however, based on the sequence of communications and subsequent non-cooperation, Paramount has reasonable grounds to suspect that certain third-party providers have been discouraged or otherwise constrained from producing PODs. Paramount respectfully urges that such silence not be permitted to prejudice its rights.

Paramount requests that the Court (a) reserve determination of the §503(b)(9) portion of Claim No. 11992 until further records are obtained, or (b) in the alternative, direct the Plan Administrator (through Plan Counsel) to produce the limited underlying receiving records or permit a narrowly tailored production to Paramount (subject to confidentiality).

On September 18, 2025, Plan Counsel confirmed by email that the objection to Claim No. 11992 is scheduled to be heard at the October 24, 2025 omnibus hearing [Exhibit D].

4. Reservation of Rights:

Paramount reserves all rights to supplement this Status Update, to amend its objection, and to present additional evidence at or before the October 24, 2025 omnibus hearing.

Respectfully submitted,

Paramount Home Collections Pvt. Ltd.
(Pro Se Creditor)

Electronically Signed By:

Mohd Ijlal Shamsi (Friday September 19, 2025)

Mohd Ijlal Shamsi
Director
36 Tavela Street, Akhtar Building
Moradabad, Uttar Pradesh 244001, India
Email: ijlal@paramounthomecollections.com
Phone: +91987031000
Dated: Friday September 19, 2025

📎 Attachments (Representative Exhibits)

- **Exhibit A** – Master Shipment Summary (Paramount’s container/PO log)
- **Exhibit B** – Representative carrier reminder email (Sept 18, 2025 to Hapag/Delmar)
- **Exhibit C** – Plan Counsel correspondence (Sept 5–12, 2025 denial of underlying records)
- **Exhibit D** – Plan Counsel email confirming Oct 24 hearing date (Sept 18, 2025)

DECLARATION OF MOHD IJLAL SHAMSI

In Support of Status Update and Reservation of Rights Regarding Claim No. 11992

I, Mohd Ijlal Shamsi, declare under penalty of perjury under the laws of the United States of America:

1. I am a Director of Paramount Home Collections Pvt. Ltd. ("Paramount"), creditor in the above-captioned case. I make this Declaration in support of Paramount's Status Update and Reservation of Rights regarding Claim No. 11992.
2. I have reviewed the Status Update and the Exhibits attached thereto. The facts stated therein, and the contents of Exhibits A–D, are true and correct to the best of my knowledge, information, and belief.
3. As further background, Paramount has made repeated written requests to carriers and logistics providers for Proofs of Delivery relating to shipments to Joann during December 2024–January 2025. Despite these efforts, certain providers have not cooperated. Paramount believes this lack of cooperation may be the result of pressure or influence from the Debtors or their affiliates. Numerous attempts have been made from June/July 2025 onwards.
4. On September 18, 2025, Plan Counsel confirmed by email that the objection to Claim No. 11992 is scheduled to be heard at the October 24, 2025 omnibus hearing.

Executed on Friday September 19, 2025, at Moradabad, India.

Electronically Signed By:

Mohd Ijlal Shamsi (Friday September 19, 2025)

Director
Paramount Home Collections Pvt. Ltd.

Certificate of Service

I hereby certify that on Friday, September 19, 2025, I caused a true and correct copy of the foregoing Status Update and Reservation of Rights Regarding Claim No. 11992, together with the attached Declaration and Exhibits A–D, to be served by email upon counsel for the Plan Administrator at Cole Schotz P.C.:

Michael Fitzpatrick, Esq. – MFitzpatrick@coleschotz.com

Stacy Newman, Esq. – SNewman@coleschotz.com

Patrick Reilley, Esq. – PReilley@coleschotz.com

Electronically Signed By:

Mohd Ijlal Shamsi (Friday September 19, 2025)

Director

Paramount Home Collections Pvt. Ltd.

Exhibit A –
Master Shipment Summary
(Paramount's container/PO log)

| Invoice Number | PO Number | Invoice Amount in USD | Selling Date | FCR Number | Master BL Number | Container Numbers | Shipping Line | Trucking Company | Carpo Size Mode | Vendor | Customer | Delivery Estimate | Date of Physical Delivery of goods to the Consignee in their Warehouse or DC / Distribution Centre | POD Status | Final Status as Per Paramount |
|----------------|----------------------|-----------------------|--------------|----------------|------------------|--|---------------|-----------------------------|-----------------|------------------------------------|-------------|-------------------|--|--------------|---|
| 4507 | 17125742 | | 30-Sep-24 | JASND3658BH024 | | HLBU178156 | | Not Known | LCL | Paramount Home Collections Pvt Ltd | Jaan Stores | 21/10/2024 | Based on our Estimate we believe these to delivered to Customer before 26 Dec 2024 i.e. before Admin Priority Period | Not Received | Not in Admin Priority |
| 4508 | 17125743 | 25,445.23 | 10-Sep-24 | JASND3658BH024 | | HLBU178156 | | Not Known | LCL | Paramount Home Collections Pvt Ltd | Jaan Stores | 21/10/2024 | Based on our Estimate we believe these to delivered to Customer before 26 Dec 2024 i.e. before Admin Priority Period | Not Received | Not in Admin Priority |
| 4509 | 17125743 | | 10-Sep-24 | JASND3658BH024 | | HLBU178156 | | Not Known | LCL | Paramount Home Collections Pvt Ltd | Jaan Stores | 21/10/2024 | Based on our Estimate we believe these to delivered to Customer before 26 Dec 2024 i.e. before Admin Priority Period | Not Received | Not in Admin Priority |
| 4528 | 17255153 | 35,000.42 | 10-01-24 | JASND2745ND024 | HLCD03124557146 | HLBU350080 / TCNU1313131 | 0000 | Not Known | FCL | Paramount Home Collections Pvt Ltd | Jaan Stores | 21/10/2024 | Based on our Estimate we believe these to delivered to Customer before 26 Dec 2024 i.e. before Admin Priority Period | Not Received | Not in Admin Priority |
| 4531 | 17331331 | | 10-01-24 | JASND2745ND024 | HLCD03124557146 | FASU0351640 | 0000 | Not Known | FCL | Paramount Home Collections Pvt Ltd | Jaan Stores | 21/10/2024 | Based on our Estimate we believe these to delivered to Customer before 26 Dec 2024 i.e. before Admin Priority Period | Not Received | Not in Admin Priority |
| 4527 | 17254133 | 107,481.27 | 10-01-24 | JASND2745ND024 | HLCD03124557146 | HEAUS588382 / GALU0977091 / PANU3463142 / HLBU2531021 / HLBU2896729 / TCNU17891654 / UACU5884679 / FASU0351640 | 1000 | Not Known | FCL | Paramount Home Collections Pvt Ltd | Jaan Stores | 21/10/2024 | Based on our Estimate we believe these to delivered to Customer before 26 Dec 2024 i.e. before Admin Priority Period | Not Received | Not in Admin Priority |
| 4529 & 4530A | 173031752 / 17251134 | 64,657.17 | 25-01-24 | JASND2745ND024 | 2304587150 | OCU17467293 / DPSU6865047 / GCU17637476 / CSNU7440212 / CSNU3311333 | 0000 | Total Distribution Services | FCL | Paramount Home Collections Pvt Ltd | Jaan Stores | 21/10/2024 | Based on our Estimate we believe these to delivered to Customer before 26 Dec 2024 i.e. before Admin Priority Period | Received | Not in Admin Priority Based on PODs |
| 4530 & 4530A | 172951935 / 17331331 | 9,000.19 | 08-01-24 | JASND2745ND024 | HLCD03124557146 | HAMU1543310 / TGHU6187044 / CAU15490532 / CAU1570729 / TGHU6187044 / UACU5551385 / USTU0311443 | 0000 | Not Known | FCL | Paramount Home Collections Pvt Ltd | Jaan Stores | 21/10/2024 | Based on our Estimate we believe these to delivered to Customer before 26 Dec 2024 i.e. before Admin Priority Period | Not Received | We Still believe these are under Admin Priority. We still wait for the Underlying proofs and PODs from Carriers and Truckers. Plan Counsel and Plan Administrator have denied to give underlying proof or logs. |
| 4531 | 17254306 / 17331331 | 6,014.47 | 13-01-24 | JASND2745ND024 | HLCD03124557146 | HAMU1543310 / TGHU6187044 / CAU15490532 / CAU1570729 / TGHU6187044 / UACU5551385 / USTU0311443 | 0000 | Not Known | FCL | Paramount Home Collections Pvt Ltd | Jaan Stores | 21/10/2024 | Based on our Estimate we believe these to delivered to Customer before 26 Dec 2024 i.e. before Admin Priority Period | Not Received | We Still believe these are under Admin Priority. We still wait for the Underlying proofs and PODs from Carriers and Truckers. Plan Counsel and Plan Administrator have denied to give underlying proof or logs. |
| 4531 | 17254306 / 17331331 | 2,540.44 | 14-01-24 | JASND2745ND024 | HLCD03124557146 | ONEU0346237 / TCU15451436 | One Line | Not Known | FCL | Paramount Home Collections Pvt Ltd | Jaan Stores | 21/10/2024 | Based on our Estimate we believe these to delivered to Customer before 26 Dec 2024 i.e. before Admin Priority Period | Not Received | We Still believe these are under Admin Priority. We still wait for the Underlying proofs and PODs from Carriers and Truckers. Plan Counsel and Plan Administrator have denied to give underlying proof or logs. |
| 4574 | 17321181 | 5,665.46 | 16-01-24 | JASND2745ND024 | HLCD03124557146 | M0A00714471 | | Not Known | LCL | Paramount Home Collections Pvt Ltd | Jaan Stores | 21/10/2024 | Based on our Estimate we believe these to delivered to Customer before 26 Dec 2024 i.e. before Admin Priority Period | Not Received | We Still believe these are under Admin Priority. We still wait for the Underlying proofs and PODs from Carriers and Truckers. Plan Counsel and Plan Administrator have denied to give underlying proof or logs. |
| 4561 | 17254307 / 17331331 | 3,578.83 | 26-01-24 | JASND2745ND024 | HLCD03124557146 | TCNU1387970 / HEAUS600474 / FASU0344733 | 0000 | Not Known | FCL | Paramount Home Collections Pvt Ltd | Jaan Stores | 21/10/2024 | Based on our Estimate we believe these to delivered to Customer before 26 Dec 2024 i.e. before Admin Priority Period | Not Received | We Still believe these are under Admin Priority. We still wait for the Underlying proofs and PODs from Carriers and Truckers. Plan Counsel and Plan Administrator have denied to give underlying proof or logs. |
| | | 478,441.41 | | | | | | | | | | | | | |

Exhibit B –
Representative carrier reminder
email
(Sept 18, 2025 email thread to
Hapag/Delmar)



SECOND REMINDER: Hapag & DELMAR USA TEAM & JOANN CONTROL TOWER WITH CDS - Top Top Urgent Request – Proof of Delivery (POD) for Attached List Containers / Claim #11992 (Joann Inc. Bankruptcy)

1 message

Ijlal Shamsi <ijlal@paramounthomecollections.com>

Thu, 18 Sept, 2025 at 20:21

To: us_air_sea@delmarusa.com, usa@service.hlag.com, JAScontroltower@hk.cds-net.asia <jascontroltower@hk.cds-net.asia>, Jerry Chan (CDS-NET) <jerry.chan@cds-net.com>, Cissy.Song@cds-net.com, cdsvmssupportasia@cdsnet.zohodesk.com <cdsvmsupportasia@cdsnet.zohodesk.com>, support@hk.cds-net.asia <support@hk.cds-net.asia>, Anu Khanna | Century | INDEL <Anu.Khanna@in.cds-net.asia>, Bernadine Engineer | INBOM <bernadine.engineer@in.cds-net.asia>, Rishabh Tyagi | Century | INDEL <rishabh.tyagi@in.cds-net.asia>, Spring Liu | Century | CNSHA <spring.liu@cn.cds-net.asia>, Sandeep Masand <sandeep.masand@triburg-indianinc.com>, Sunny Thomas <sunny.thomas@triburg.co.in>, Arbab Shamsi <arbab@paramounthomecollections.com>, Mohamamd Asif <asif@paramounthomecollections.com>

Please do not change the subject unless necessary or appropriate. Please use the REPLY ALL function to keep everyone informed.

Dear Delmar USA & Hapag USA Team, and Joann Control Tower with CDS,

This is a follow-up to our earlier request (copied below). We have not yet received any reply from your teams regarding the Proof of Delivery (POD) documents and related records for the listed containers. The file is attached again.

As noted, these records are required in connection with an active U.S. Bankruptcy Court proceeding (Case No. 25-10068, Claim #11992). The absence of these records is causing serious prejudice to Paramount's ability to properly substantiate its claim.

We respectfully urge you to treat this as a top priority. Please provide, within 24 hours:

- Signed PODs,
- Driver dispatch/arrival logs,
- Appointment confirmations,
- Gate-in/gate-out records, and
- Any EDI confirmations for the listed containers.

We ask you (as Joann's supply chain partner) to please coordinate and confirm which party (or subcontracted trucker) executed the final mile delivery to Joann's DCs, and to urgently share the corresponding POD documentation.

If these documents are not provided, we will have no choice but to report the continued non-cooperation to the Plan Administrator, Debtors' counsel, and ultimately to the Court.

Thank you for your cooperation.

—— Forwarded message ——

From: Ijlal Shamsi <ijlal@paramounthomecollections.com>

Date: Tue, 16 Sept 2025 at 17:24

Subject: Hapag & DELMAR USA TEAM - Top Top Urgent Request – Proof of Delivery (POD) for Attached List Containers / Claim #11992 (Joann Inc. Bankruptcy)

To: <usa@service.hlag.com>, JAScontroltower@hk.cds-net.asia <jascontroltower@hk.cds-net.asia>, Jerry Chan (CDS-NET) <jerry.chan@cds-net.com>, <Cissy.Song@cds-net.com>, cdsvmssupportasia@cdsnet.zohodesk.com <cdsvmsupportasia@cdsnet.zohodesk.com>, support@hk.cds-net.asia <support@hk.cds-net.asia>, Anu Khanna | Century | INDEL <Anu.Khanna@in.cds-net.asia>, Bernadine Engineer | INBOM <bernadine.engineer@in.cds-net.asia>, Rishabh Tyagi | Century | INDEL <rishabh.tyagi@in.cds-net.asia>, Spring Liu | Century | CNSHA <spring.liu@cn.cds-net.asia>, Sandeep Masand <sandeep.masand@triburg-indianinc.com>, Sunny Thomas <sunny.thomas@triburg.co.in>, Arbab Shamsi <arbab@paramounthomecollections.com>, Mohamamd Asif <asif@paramounthomecollections.com>

Please do not change the subject unless necessary or appropriate. Please use the REPLY ALL function to keep everyone informed.

Dear Delmar USA & Hapag USA Team,

I am writing on behalf of Paramount Home Collections Pvt. Ltd., India, regarding shipments sent to Joann Inc. in the United States under Hapag-Lloyd bills of lading.

We have information from Century that you have been handling the containers for Joann Stores in the USA as your details are written on the BLs.

We urgently require the **Proof of Delivery (POD) records / distribution center confirmations** for the attached containers delivered in late 2024 / early 2025:

These documents are required in connection with U.S. Bankruptcy Court Case No. 25-10068 (Joann Inc.), in which our Claim #11992 is under active review. The absence of these records is putting our financial and legal rights at risk.

Specifically, we respectfully request:

- Date of delivery,
- Destination/DC address,
- Signed PODs or driver receipts,
- Gate-in/gate-out logs or yard appointments,
- Any available EDI inbound confirmations.

We ask you (as Joann's supply chain partner) to please coordinate and confirm which party (or subcontracted trucker) executed the final mile delivery to Joann's DCs, and to urgently share the corresponding POD documentation.

As time is of the essence here, we hereby request that unless all PODs, driver dispatch/arrival logs, appointment confirmations, gate-in/gate-out records, and any EDI confirmations for the listed containers are provided within 24 hours, we will have no choice but to report non-cooperation to the Plan Administrator, Joann's counsel, and ultimately to the Court.

We have copied Joann's legal counsel and the Plan Administrator so all parties remain fully aligned on this matter.

Please confirm receipt of this request and provide the documents at the earliest possible time.

CC: Mr. Michael Fitzpatrick, Ms. Stacy Newman, Mr. Patrick Reilley (Cole Schotz)

- Thanks
Warm Regards,



-Ijlal Shamsi
Director // COO & CFO
So | Paramount Home™
-Paramount Home Collections Private Limited
ijlal@paramounthomecollections.com
<https://www.paramounthomecollections.com>
+919897031000
<https://pmhc.in/ij>

Factory Compliances:



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Please see these important Web Links Related to our Factory

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Factory Magazine: <https://pmhc.in/mag24>

Factory Profile: <https://pmhc.in/ppt>

Factory CSR & Sustainability: <https://pmhc.in/sust24>

Factory Corporate Video: <https://pmhc.in/corp>

Joann MASTER LIST Outstanding Updated 11 Aug 2025.xlsx
19 KB

**Exhibit C –
Plan Counsel correspondence
(Sept 4–12, 2025 denial of underlying
records)**


RE: Request for Assistance – Non-Cooperation from Joann's Trucking Partner (TLDV) Regarding POD Disclosure for Paramount Claim #11992

1 message

Fitzpatrick, Michael <MFitzpatrick@coleschotz.com>

Fri, 12 Sept, 2025 at 19:03

To: Ijlal Shamsi <ijlal@paramounthomecollections.com>

Cc: Newman, Stacy <SNewman@coleschotz.com>, Reilley, Patrick <PREilley@coleschotz.com>, Mohamamd Asif <asif@paramounthomecollections.com>, Arbab Shamsi <arbab@paramounthomecollections.com>

Ijlal – The Plan Administrator was able to provide receipt date information and last known location information for each of the purchase order and containers identified by Paramount in the Summary Excel File. The Plan Administrator and her team are confident their records are accurate and the further documentation you are requesting from TLDV and other shipping lines is a futile exercise at this point with respect to Paramount's asserted 503(b)(9) claim.

Best,

Fitz

**MICHAEL FITZPATRICK**

ASSOCIATE

OFFICE 302.651.2008

CELL 215.847.2304

EMAIL mfitzpatrick@coleschotz.com

500 Delaware Avenue | Suite 600 | Wilmington, DE 19801

NEW JERSEY NEW YORK DELAWARE MARYLAND TEXAS FLORIDA WASHINGTON, D.C

VCARD | BIO | COLESCHOTZ.COM

Legal Practice Assistant: Mary VanDermark | 302.652.3131 x 2500 | MVanDermark@coleschotz.com

From: Ijlal Shamsi <ijlal@paramounthomecollections.com>**Sent:** Thursday, September 11, 2025 6:04 PM**To:** Fitzpatrick, Michael <MFitzpatrick@coleschotz.com>**Cc:** Ijlal Shamsi <ijlal@paramounthomecollections.com>; Newman, Stacy <SNewman@coleschotz.com>; Reilley, Patrick <PREilley@coleschotz.com>; Mohamamd Asif <asif@paramounthomecollections.com>; Arbab Shamsi <arbab@paramounthomecollections.com>**Subject:** Re: Request for Assistance – Non-Cooperation from Joann's Trucking Partner (TLDV) Regarding POD Disclosure for Paramount Claim #11992

Please do not change the subject unless necessary or appropriate. Please use the REPLY ALL function to keep everyone informed.

Dear Mr. Fitzpatrick,

Page 13 of 23

Thank you for your email and for relaying the Plan Administrator's position. We acknowledge that your team has provided the compiled spreadsheet data; however, without the underlying receipt records or corresponding Proof of Delivery (POD) documentation, we are unable to independently verify

As you are aware, we have been actively pressing TLDV and the shipping lines for PODs, with limited cooperation to date. Until that process is fully exhausted and we have clarity, we cannot consent to the proposed reclassification of Claim No. 11992.

We must therefore respectfully preserve our rights and continue to seek evidence through all available channels. Should TLDV or Joann's 3PL/DC partners ultimately confirm qualifying deliveries, we believe those receipts would entitle us to maintain at least a portion of the administrative priority claim.

Thank you for your understanding.

- Thanks

Warm Regards,

-Ijlal Shamsi
Director // COO & CFO
So | Paramount Home™
-Paramount Home Collections Private Limited
ijlal@paramounthomecollections.com
<https://www.paramounthomecollections.com>
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<https://pmhc.in/ij>

Factory Compliances:

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Factory Profile: <https://pmhc.in/ppt>

Factory CSR & Sustainability: <https://pmhc.in/sust24>

On Fri, 12 Sept, 2025, 01:20 Fitzpatrick, Michael, <MFitzpatrick@coleschotz.com> wrote:

Ijlal – I discussed your request for supporting documentation and the Plan Administrator's team informed me that the information on their end is in compiled spreadsheet within their system. There is not an individual document I can provide to you for each of the purchase orders/containers. I would reiterate that the Plan Administrator believes Paramount is entitled to a \$478,641.62 general unsecured claim against the Debtors' estates. Please let us know if Paramount is agreeable to the reclassification of Claim No. 11992 from: (i) \$135,479.21 503(b)(9) and (i) \$343,162.41 general unsecured claim to: (i) \$478,641.62 general unsecured claim, which is consistent with the Debtors' Eleventh Omnibus Objection to Claims [Docket No. 1407].

Thank you.

Best,

Fitz

MICHAEL FITZPATRICK

ASSOCIATE

OFFICE 302.651.2008

CELL 215.847.2304

EMAIL mfitzpatrick@coleschotz.com

500 Delaware Avenue | Suite 600 | Wilmington, DE 19801

NEW JERSEY NEW YORK DELAWARE MARYLAND TEXAS FLORIDA WASHINGTON, D.C.

VCARD | BIO | [COLESCHOTZ.COM](https://www.coleschotz.com)

Legal Practice Assistant: Mary VanDermark | 302.652.3131 x 2500 | MVanDermark@coleschotz.com

From: Ijlal Shamsi <ijlal@paramounthomecollections.com>

Sent: Thursday, September 4, 2025 9:01 PM

To: Fitzpatrick, Michael <MFitzpatrick@coleschotz.com>

Cc: Newman, Stacy <SNewman@coleschotz.com>; Reilley, Patrick <PReilley@coleschotz.com>; Mohamamd Asif <asif@paramounthomecollections.com>; Arbab Shamsi <arbab@paramounthomecollections.com>

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****Please do not change the subject unless necessary or appropriate. Please use the REPLY ALL function to keep everyone informed.****

Dear Mr. Fitzpatrick,

Thank you for the update and for returning the file with Columns O and P. Before we respond to your requested reclassification, could you please share the underlying receipt records supporting Column O and Column P for the listed POs/containers—i.e., **the WMS/yard/appointment logs (DC name, check-in/out timestamps, appointment/ASN numbers) and any EDI inbound confirmations your team relied on?**

We are simultaneously continuing to press TLDV + the different Shipping Lines for the remaining PODs. You have been on copy to those emails and have seen yourself how poor co-operation we have recieved especially from TLDV. If we do not locate any qualifying receipts, we will revert promptly; in the meantime, we cannot yet consent to reclassification.

Also, for clarity, if goods were received **at a third-party DC acting as Joann's agent** within the window, would those receipts be included in Column O? If so, which 3PL/DCs were used for Joann during Dec 2024–Jan 2025 so we can align our requests?

Thank you for your cooperation.

- Thanks

Warm Regards,

-Ijlal Shamsi
Director // COO & CFO
So | Paramount Home™
-Paramount Home Collections Private Limited
ijlal@paramounthomecollections.com
<https://www.paramounthomecollections.com>
+919897031000
<https://pmhc.in/ij>

Factory Compliances:

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Factory CSR & Sustainability: <https://pmhc.in/sust24>

Factory Corporate Video: <https://pmhc.in/corp>

On Fri, 5 Sept, 2025, 00:56 Fitzpatrick, Michael, <MFitzpatrick@coleschotz.com> wrote:

Good Afternoon Ijlal – The Plan Administrator's team has finished reviewing the documentation provided by Paramount. Please find attached an update excel file you previously provided us with that now includes new columns O and P. Column O lists the date the container(s) and good associated with each purchase order was received into the Debtors' distribution center yard (if received by the Debtors) and Column P lists the last known location of the container if it was not received by the Debtors at their distribution center.

Please note that none of the containers and goods associate with the Paramount purchase orders were received into the Debtors' distribution center yard within the time frame to entitle the goods to a 503(b)(9) claim under the United States Bankruptcy Code (December 26, 2024 to January 15, 2025). As a result, the Debtors believe Paramount is entitled to a \$478,641.62 general unsecured claim against the Debtors' estates. Please let us know if Paramount is agreeable to the reclassification of Claim No. 11992 from: (i) \$135,479.21 503(b)(9) and (i) \$343,162.41 general unsecured claim to: (i) \$478,641.62 general unsecured claim, which is consistent with the Debtors' Eleventh Omnibus Objection to Claims [Docket No. 1407].

Thank you.

Best,

Fitz

MICHAEL FITZPATRICK

ASSOCIATE

OFFICE 302.651.2008

CELL 215.847.2304

EMAIL mfitzpatrick@coleschotz.com

500 Delaware Avenue | Suite 600 | Wilmington, DE 19801

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Legal Practice Assistant: Mary VanDermark | 302.652.3131 x 2500 | MVanDermark@coleschotz.com

From: Ijlal Shamsi <ijlal@paramounthomecollections.com>

Sent: Tuesday, August 12, 2025 1:50 PM

To: Fitzpatrick, Michael <MFitzpatrick@coleschotz.com>

Cc: Newman, Stacy <SNewman@coleschotz.com>; Reilley, Patrick <PReilley@coleschotz.com>; Mohamamd Asif <asif@paramounthomecollections.com>; Arbab Shamsi <arbab@paramounthomecollections.com>

Subject: Re: Request for Assistance – Non-Cooperation from Joann's Trucking Partner (TLDV) Regarding POD Disclosure for Paramount Claim #11992

Dear Mr. Michael Fitzpatrick,

Thank you for your email and for confirming receipt of our compiled documentation. We appreciate you reviewing the material with the Plan Administrator's team.

We remain committed to providing any additional information you may require and are continuing our efforts to secure the Proof of Delivery (POD) records from TLDV – Total Distribution Services.

If you or the Plan Administrator's office can assist in obtaining these PODs directly from TLDV, it would greatly help expedite the process and ensure we can resolve the 503(b)(9) portion of our claim without further delay.

We will keep you updated on any new developments from our side.

- Thanks

Warm Regards,

-Ijlal Shamsi
Director // COO & CFO

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**Exhibit D –
Plan Counsel email
confirming Oct 24 hearing date
(Sept 18, 2025)**


Re: Request for Clarification – Hearing Date for Paramount Claim #11992 (Joann Inc., Case No. 25-10068)

1 message

Ijlal Shamsi <ijlal@paramounthomecollections.com>

Thu, 18 Sept, 2025 at 18:53

To: Fitzpatrick, Michael <MFitzpatrick@coleschotz.com>, Newman, Stacy <snewman@coleschotz.com>, Reilley, Patrick <preilley@coleschotz.com>, Arbab Shamsi <arbab@paramounthomecollections.com>, Mohamamd Asif <asif@paramounthomecollections.com>

****Please do not change the subject unless necessary or appropriate. Please use the REPLY ALL function to keep everyone informed.****

Dear Mr. Michael Fitzpatrick,

Thank you for confirming that the hearing on our claim objection has been moved from September 22, 2025 to the October 24, 2025 omnibus hearing.

As you have seen from the correspondence copied to your office, Paramount has been actively pursuing Proofs of Delivery and related receiving records from multiple carriers and logistics providers. We are still awaiting responses from certain parties. Their continued silence and lack of cooperation should not prejudice our rights. We respectfully maintain that the administrative priority portion of Claim No. 11992 should remain reserved until all available records are gathered and presented to you, the Plan Administrator, and the Court.

We will continue our efforts and will supplement the record before the October 24, 2025 hearing.

- Thanks
Warm Regards,

So | **PARAMOUNT**
HOME



-Ijlal Shamsi

Director // COO & CFO

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Ijlal – The bankruptcy court no longer had availability on September 22nd so the hearing with respect to the claim objection was adjourned until October 24th. Although the hearing was adjourned, the Plan Administrator still asserts the entire amount of Paramount's claim is a general unsecured claim. When will you be in a position to confirm this is correct? We have seen the emails you have sent to various carriers and shippers who have all said they either already provided the information or did not have the information you are looking for.

Thank you.

Best,

Fitz



MICHAEL FITZPATRICK
ASSOCIATE

OFFICE 302.651.2008

CELL 215.847.2304

EMAIL mfitzpatrick@coleschotz.com

500 Delaware Avenue | Suite 600 | Wilmington, DE 19801

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Legal Practice Assistant: Mary VanDermark | 302.652.3131 x 2500 | MVanDermark@coleschotz.com

From: Ijlal Shamsi <ijlal@paramounthomecollections.com>

Sent: Thursday, September 18, 2025 5:05 AM

To: Fitzpatrick, Michael <MFitzpatrick@coleschotz.com>; Newman, Stacy <SNewman@coleschotz.com>; Reilley, Patrick <PREilley@coleschotz.com>; Arbab Shamsi <arbab@paramounthomecollections.com>; Mohamamd Asif <asif@paramounthomecollections.com>

Subject: Request for Clarification – Hearing Date for Paramount Claim #11992 (Joann Inc., Case No. 25-10068)

****Please do not change the subject unless necessary or appropriate. Please use the REPLY ALL function to keep everyone informed.****

Dear Mr. Michael Fitzpatrick,

I hope you are doing well.

I am writing on behalf of Paramount Home Collections Private Limited with respect to Claim No. 11992 in the Joann Inc. bankruptcy proceedings. We have reviewed recent omnibus orders and notices (attached) showing that the September 22, 2025 hearing has been cancelled, and new omnibus hearings are scheduled for October 8 and October 24, 2025.

Could you kindly confirm on which upcoming omnibus hearing date our claim objection (Debtors' Eleventh Omnibus Objection, Docket No. 1319, as responded to by Paramount) is scheduled to be heard?

As you will have seen from our correspondence, we are continuing to diligently follow up with all relevant parties for the required documents, despite very limited cooperation. Having clarity on the hearing date will allow us to finalize our materials and ensure we comply with all deadlines.

Thank you very much for your assistance and confirmation.

- Thanks

Warm Regards,

-Ijlal Shamsi
Director // COO & CFO
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